

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF WEST VIRGINIA  
AT CHARLESTON**

|   |   |
|---|---|
| <b>IN RE: ETHICON, INC., PELVIC<br/>REPAIR SYSTEM PRODUCTS<br/>LIABILITY LITIGATION</b> | <b>Master File No. 2:12-MD-02327<br/>MDL 2327</b><br><br><b>JOSEPH R. GOODWIN<br/>U.S. DISTRICT JUDGE</b> |
| <b>THIS DOCUMENT RELATES TO ALL<br/>CASES</b>   |   |

**CROSS NOTICE OF DEPOSITION OF MARK YALE**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that the deposition of MARK YALE will be taken jointly in connection with *In Re Pelvic Mesh/Gynecare Litigation*, Superior Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10, upon oral examination on August 7, 2013, at 9:00 a.m. EST, at Riker Danzig Scherer Hyland and Perretti, One Speedwell Avenue, Headquarters Plaza, Morristown, Jersey 07962-1981, Dial In: 800-747-5150, Participant Code: 7644044.

**PLEASE TAKE FURTHER NOTICE** that in accordance with Rule 30 of the Federal Rules of Civil Procedure, the procedures set forth *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327, and Rule 4:14 of the New Jersey Rules of Court, Defendants Ethicon Inc. and Johnson & Johnson hereby cross-notice this deposition for any and all purposes permitted by the Federal Rules of Civil Procedure, the rules of the MDL Court, and any other state or local rules that apply to this action. Defendants Ethicon, Inc. and Johnson & Johnson further state that this deposition shall be conducted in accordance with and subject to the Protective Orders entered in *In Re Pelvic Mesh/Gynecare Litigation*, Superior

Court of New Jersey Law Division, Atlantic County, Case No. 291 CT, Master Case 6341-10  
and in *In Re: Ethicon Inc., Pelvic Repair System Products Liability Litigation*, MDL No. 2327.

This deposition will be taken before a person authorized by law to administer  
oaths.

Dated: August 5, 2012.

Respectfully submitted,

/s/Christy D. Jones  
Christy D. Jones  
Butler, Snow, O'Mara, Stevens &  
Cannada, PLLC  
1020 Highland Colony Parkway  
Suite 1400 (39157)  
P.O. Box 6010  
Ridgeland, MS 39158-6010  
(601) 985-4523  
[Christy.jones@butlersnow.com](mailto:Christy.jones@butlersnow.com)

/s/ David B. Thomas  
David B. Thomas (W.Va. Bar #3731)  
Thomas Combs & Spann PLLC  
300 Summers Street  
Suite 1380 (25301)  
P.O. Box 3824  
Charleston, WV 25338  
(304) 414-1807  
[dthomas@tcspllc.com](mailto:dthomas@tcspllc.com)

COUNSEL FOR DEFENDANTS  
ETHICON, INC. AND  
JOHNSON & JOHNSON

**CERTIFICATE OF SERVICE**

I hereby certify that on August 5, 2013, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send notification of such filing to CM/ECF participants registered to receive service in this MDL.

/Christy D. Jones

Christy D. Jones

ButlerSnow 17233675v1